



STATE OF WISCONSIN  
PSC REF#: 411508  
DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor  
Joel Brennan, Secretary  
Susan Brown, Division Administrator

Public Service Commission of Wisconsin  
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May 14, 2021

Ms. Steffany Powell Coker  
Secretary of the Commission  
Public Service Commission of Wisconsin  
4822 Madison Yards Way  
Madison WI, 53705

**Re: Roadmap to Zero Carbon Investigation Comments Docket 5-EI-158**

Dear Ms. Powell Coker:

Thank you for issuing the Notice of Investigation (NOI) to consider the ongoing transition to zero-carbon electricity generation in Wisconsin. The Office of Sustainability and Clean Energy (OSCE) has reviewed investigation topics and appreciates the opportunity to provide comments.

The work of the Public Service Commission of Wisconsin (PSCW) and the OSCE are critically important to Wisconsin's residents. Past research by the Wisconsin Initiative on Climate Change Impacts indicates that the statewide average annual temperatures are likely to warm by 6 to 7 degrees Fahrenheit by the middle of the century. This change could result in two weeks per year of dangerous heat. Climate change also threatens to increase the frequency and severity of extreme weather events such as extended dry periods and periods of heavy rains that cause flooding. These climate changes pose significant threats to Wisconsin communities, the health of our residents, our economy, and our future. These potential impacts make the work of the PSCW and the OSCE more urgent than ever.

The Governor's Task Force on Climate Change (Task Force), as created by Executive Order #52, delivered 55 climate solutions and strategies across nine sectors to Governor Evers that mitigate and adapt to the effects of climate change for the benefit of all Wisconsin communities. The Task Force is working closely with the OSCE to implement these solutions and strategies by incorporating climate adaptation strategies into existing planning.

In addition to Task Force recommendations and other topics cited, the NOI aims to evaluate recommendations outlined in the Clean Energy Plan, which is expected to be released in 2021. Governor Evers issued Executive Order #38, which created and directed the OSCE to develop a comprehensive state-wide clean energy plan. Recognizing the existing conditions in Wisconsin, and the need to move Wisconsin toward a clean energy economy, the Clean Energy Plan seeks to achieve the following objectives:

- Put Wisconsin on a path for all electricity consumed within the state to be 100 percent carbon-free by 2050,
- Ensure that the State of Wisconsin is fulfilling the carbon reduction goals of the 2015 Paris Climate Agreement,
- Reduce the disproportionate impacts of energy generation/use on low-income and communities of color, ensure these communities are prioritized in receiving clean energy economic and health benefits.
- Maximize the creation of, and equitable opportunities for clean energy jobs, economic development and stimulus, and retention of energy investment dollars in Wisconsin.
- Improve reliability and affordability of the energy system.
- Strengthen the clean energy workforce through training and education, while retraining workers affected by the transition from fossil fuel to clean sources of energy.
- Protect human and environmental health by reducing ecosystem pollution from fossil fuels.

We believe the following should be prioritized at the PSCW to help reach these objectives and to accelerate the state's transition to zero-carbon electricity generation in Wisconsin:

**Create a formal PSCW process to evaluate, plan, measure, and track progress over time to ensure Wisconsin can meet its emission reduction goals.**

A new process would allow the PSCW to consider the big picture decarbonization path, which the current Strategic Energy Assessment does not take into consideration. It would also allow PSCW staff to build on its relationships and work collaboratively with the OSCE, state agencies, as well as tap into the expertise and capacities of Wisconsin's university and technical college systems to model scenarios that provide a forecast of the impacts of local, state, regional, and federal policies as part of a comprehensive clean energy plan (CEP). The process should allow the CEP to be taken into the record and be an integral part of PSCW decision making. This will create a forward-thinking process to ensure stakeholder engagement, identify long-term goals and interests, the means of achieving them and to evaluate the ability to meet goals, and report on progress over time.

A new formal process will also reaffirm the state's commitment to just transition and environmental justice – reducing climate change impacts on communities of color and communities of individuals with low incomes. These communities often experience the first and worst consequences of climate change and have long been on the frontlines of this battle. Incorporating this lens of environmental justice ensures the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

This process would strengthen our ability to collaboratively explore, help in decision making, and implementation related to (not limited to) : investment in and incentivizing energy storage and demand-side management; developing new emission goals and set up planning (Integrated Resource Planning and a Clean Energy Standard); helping to align Midcontinent Independent

System Operator rules, governance with transmission needs to support local clean energy goals; foster innovation, research and business development for renewable energy, energy efficiency and sustainability; improve utility-stakeholder collaboration; and improve greenhouse gas (GHG) data collection.

The OSCE is grateful for the opportunity to share our recommendation with the PSCW. Thank you for your review and consideration. I am available at [maria.redmond@wisconsin.gov](mailto:maria.redmond@wisconsin.gov) or (608) 267-2713 to answer any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maria Redmond', written in a cursive style.

Maria Redmond  
Director, Office of Sustainability and Clean Energy  
Department of Administration